

EXHIBIT 2

WANDA OVALLES, ET AL. vs. SONY ELECTRONICS INC., ET AL.

04/23/2015

Julio Posse

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

WANDA OVALLES, INDIVIDUALLY AND)
P.P.A.A. OVALLES AND WILSON) Civil Action No.
OVALLES,) 14-137M
Plaintiffs,)
VS)
SONY ELECTRONICS INC.; BEST BUY)
CO., INC.; FOXCONN)
INTERNATIONAL, INC.; AND JOHN)
DOE CORPORATIONS 1-4,,)
Defendants.)

DEPOSITION OF: Julio Posse
DATE: April 23, 2015
HELD AT: Shipman & Goodwin LLP
One Constitution Plaza
Hartford, Connecticut

Reporter: Robin Balletto, RMR, LSR #230
BRANDON HUSEBY REPORTING & VIDEO
249 Pearl Street
Hartford, Connecticut 06106
(860) 549-1850

WANDA OVALLES, ET AL. vs. SONY ELECTRONICS INC., ET AL.

04/23/2015

Julio Posse

<p style="text-align: right;">Page 22</p> <p>1 objections, and you can proceed as you see fit.</p> <p>2 MR. BERGENN: Just for the record, can</p> <p>3 you articulate what the potential risk is under</p> <p>4 any rule of evidence for procedure for a document</p> <p>5 to be shown on the screen before you look at it?</p> <p>6 MR. HAFNER: I'm entitled to see the</p> <p>7 document before it is shown to a witness. If we</p> <p>8 were in a courtroom, the court would require you</p> <p>9 to let counsel see it before it's shown to the</p> <p>10 witness, let the judge see it before it's shown to</p> <p>11 the witness, and I get to decide whether I have</p> <p>12 any objection. I may or may not, I don't know.</p> <p>13 But the way you intend to proceed, as I understand</p> <p>14 it, is the document is up on the screen, it's on</p> <p>15 the videotape before I even have an opportunity to</p> <p>16 review it to object.</p> <p>17 MR. ANGELONE: I join in that objection.</p> <p>18 MR. HAFNER: We've registered our</p> <p>19 objection.</p> <p>20 MR. BERGENN: Thank you. I appreciate</p> <p>21 your expression. The way these things are set up</p> <p>22 it's designed so that you can see them</p> <p>23 simultaneously, and I assure you we will never put</p> <p>24 this before any trier of fact without court</p> <p>25 approval.</p>	<p style="text-align: right;">Page 24</p> <p>1 A I gave it to --</p> <p>2 Q I have it.</p> <p>3 A I don't have a copy, or I would give it to</p> <p>4 you.</p> <p>5 Q I'm looking at the CV, and I don't have it</p> <p>6 loaded so I can't show it on the screen, but this is</p> <p>7 in sort of reverse chronological order, right? The</p> <p>8 most recent is on top?</p> <p>9 A Right. I gave you a copy. I don't have a</p> <p>10 copy to review.</p> <p>11 Q I'm showing you, I don't know if it's the</p> <p>12 original or the copy, but I'm not sure there should be</p> <p>13 any difference.</p> <p>14 Am I correct in looking at the way this is</p> <p>15 formatted that you have the most recent experience on</p> <p>16 the front and working backwards is how we can see your</p> <p>17 chronological education, training, and experience?</p> <p>18 A In regards to the formal education is listed</p> <p>19 first, and then the additional education is, as you</p> <p>20 mentioned, in reverse chronological order.</p> <p>21 MR. BERGENN: I see. So let me mark</p> <p>22 this document, if we could.</p> <p>23 (Plaintiff's Exhibit 1, CV of Julio</p> <p>24 Posse: Marked for Identification.)</p> <p>25</p>
<p style="text-align: right;">Page 23</p> <p>1 BY MR. BERGENN:</p> <p>2 Q So we're back with your history, and you were</p> <p>3 describing the educational background, and I</p> <p>4 understand you took the sort of engineering technical</p> <p>5 track instead of the arts and sciences academic track?</p> <p>6 A That is correct.</p> <p>7 Q And that was post high school?</p> <p>8 A No.</p> <p>9 Q Or starts in high school?</p> <p>10 A No, it starts after grade school.</p> <p>11 Q I see. And how far did you go along that</p> <p>12 track?</p> <p>13 A Six years of electronics.</p> <p>14 Q And have you since that time had any formal</p> <p>15 education?</p> <p>16 A Many, many seminars and training, but not</p> <p>17 really school education.</p> <p>18 Q And were those generally in connection with</p> <p>19 your employment?</p> <p>20 A Yes.</p> <p>21 Q That is to say there would be seminars that</p> <p>22 your employer sent you to to continue your education?</p> <p>23 A Correct.</p> <p>24 Q Do you have your CV? I understand you</p> <p>25 brought it.</p>	<p style="text-align: right;">Page 25</p> <p>1 BY MR. BERGENN:</p> <p>2 Q So when I'm looking at the Julio Posse</p> <p>3 exhibit, the first three pages describe your</p> <p>4 professional experience; is that correct?</p> <p>5 A Yes, sir.</p> <p>6 Q And then what would be the fourth page is</p> <p>7 formal education?</p> <p>8 A Correct.</p> <p>9 Q And that's what lists your Institute of</p> <p>10 Applied Electronics for two years, and four years</p> <p>11 before that Institute of Electronics Technology in</p> <p>12 Uruguay?</p> <p>13 A Yes. The first one is a private school that</p> <p>14 I attended at night, and I obtained a diploma in radio</p> <p>15 and television repair.</p> <p>16 Q I see. And is that how you start your</p> <p>17 career, in television repair?</p> <p>18 A Yes.</p> <p>19 Q And if you could just briefly describe your</p> <p>20 work experience since 1972 just sequentially, because</p> <p>21 I'm not sure that this resume is going to cover</p> <p>22 everything, right?</p> <p>23 A That is correct. Well, from the '70s I</p> <p>24 worked in two major companies in Uruguay and</p> <p>25 Argentina, one was a representative of major brands</p>